

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:) Bankruptcy Case No. -13-24023-GLT
)
TERESA M. SULLIVAN and) Chapter 13
JOHN L. SULLIVAN,)
) Document No. _____
Debtors,)
) Related to Claim No. 13
PNC BANK, N.A.,)
)
Movant,)
)
vs.)
)
TERESA M. SULLIVAN,)
JOHN L. SULLIVAN and)
RONDA J. WINNECOUR, TRUSTEE,)
)
Respondents.)

DECLARATION

We, Teresa M. Sullivan, and John L. Sullivan, Debtors in the above-captioned Chapter 13 matter, do hereby swear and affirm under penalty of perjury that the existing Chapter 13 Plan is sufficient to fund the Notice of Mortgage Payment Change filed by creditor, PNC, N.A., on October 27, 2016. The monthly mortgage payment will change solely as a result of an escrow change from \$262.12 to the new escrow payment of \$263.51. The change would slightly increase the escrow payment being made and no effect of any significance would occur to the plan.

Debtors' current mailing address is 112 Neilson Drive, Jefferson Hills PA 15025.

The Chapter 13 Trustee has the consent of the Debtors and their counsel to commence disbursement of the modified monthly mortgage payment as set forth in the Notice of Mortgage Payment Change filed with the Court by the aforesaid creditor.

Counsel for the aforesaid Debtors has examined the record and does not believe this change requires the filing of an Amended Chapter 13 Plan and the Plan is adequately funded.

We verify the statements made in this Declaration are true and correct. We understand false statements herein are made subject to the penalties of perjury.

November 1, 2016
Date

/s/ James E. Miscavage
JAMES E. MISCAVAGE
Attorney at Law
55 Old Clairton Road, Suite 204
Pittsburgh PA 15236
(412) 653-5711
jamesmiscavage@gmail.com
PA I.D. No. 41001

/s/ Teresa M. Sullivan
TERESA M. SULLIVAN

/s/ John L. Sullivan
JOHN L. SULLIVAN